

9-30-85

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SEP 30 1985

H/S 533

Mark Horton, Assistant Director  
Office of Operations and Enforcement  
Washington Department of Ecology  
PV-11  
Olympia, Washington 98504

Dear Mr. Horton:

In accordance with §3008(a)(2) of RCRA and the EPA/WDOE Memorandum of Agreement, EPA is hereby notifying the state of Washington that enforcement action is being taken by EPA against Pacific Wood Treating Corporation (PWT) of Ridgefield, Washington, for violations concerning PWT's Ridgefield Brick and Tile site (RBT). In a meeting with members of the staff of DOE's Southwest office on September 20, 1985, enforcement action concerning this site was deferred to EPA.

WDOE and EPA conducted separate inspections of the RBT site in April, 1985. WDOE's inspection report and written correspondence from WDOE to PWT concerning that inspection indicate that WDOE does not intend to institute enforcement action against PWT with regard to RBT's compliance with interim status standards.

EPA has determined that RBT is not in compliance with interim status ground water monitoring standards, or with financial, closure, or post-closure requirements. EPA has therefore chosen to take enforcement action in the form of a Complaint and Compliance Order pursuant to §3008 of RCRA. A copy of this Order is enclosed.

Although PWT has capped the landfill at the RBT site and no longer receives wastes, closure of that facility was not completed under WDOE standards, since there was no public notification of closure. Additionally, we have concerns about the acceptability of the closure plan in that it does not adequately address ground water monitoring or clean-up of the original disposal site, among other things. Despite the fact that RBT was a late notifier, the facility is subject to all interim status standards and must conduct its operations, including closure, in compliance with those standards.



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Although it would have been preferable for WDOE to have initiated enforcement action against PWT in order to bring the RBT facility into compliance with the current Washington Dangerous Waste Regulations to which it is subject, EPA is taking the enclosed action to ensure that such compliance is achieved.

Please contact either me or Ken Feigner if you would like to discuss this action, at (206) 442-1906 or 442-2782, respectively.

Sincerely,

Charles F. Findley, Director  
Hazardous Waste Division

Enclosures

cc: Frank Monohan, WDOE SM  
Clark Gaulding, WDO